United States Environmental Protection Agency
Washington, D.C. 20460

Water Compliance Inspection Report

Section A: National Data System Coding (i.e., PCS)

Transaction Code	NPDES	yr/mo/day	Inspection Type	Inspector	Fac Type
1 N	WAR0000048	151119	~	R	2

Remarks

21 ____ 66

Inspection Work Days	Facility Self-Monitoring Evaluation Rating	BI	QA	Reserved
67 10 69	70	71	72	73 74 75 80

Section B: Facility Data

Name and Location of Facility Inspected *(For industrial users discharging to POTW, also include POTW name and NPDES permit number)*	Entry Time/Date	Permit Effective Date
Ershigs, Inc. 742 Marine Drive Bellingham, WA 98227	8:15AM 11/19/15	01/02/2015
	Exit Time/Date 1:15PM 11/19/15	Permit Expiration Date 12/31/2019

Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s)	Other Facility Data *(e.g., SIC NAICS, and other descriptive information)*
Scott Strickler - Material Administrator/ Env. Safety (360) 527-3437	326199 Plastics Product Manufacturing 48.768633 -122.519312

Name, Address of Responsible Official/Title/Phone and Fax Number	Contacted
Scott Strickler - Material Administrator/ Env. Safety (360) 527-3437 P.O. Box 1707 Bellingham, WA 98227	☑ Yes ☐ No

Section C: Areas Evaluated During Inspection *(Check only those areas evaluated)*

✓ Permit	☐ Self-Monitoring Program	☐ Pretreatment	☐ MS4
✓ **Records/Reports**	☐ Compliance Schedules	☐ Pollution Prevention	
✓ Facility Site Review	☐ Laboratory	✓ Storm Water	
✓ Effluent/Receiving Waters	✓ Operations & Maintenance	☐ Combined Sewer Overflow	
☐ Flow Measurement	☐ Sludge Handling/Disposal	☐ Sanitary Sewer Overflow	

Section D: Summary of Findings/Comments

(Attach additional sheets of narrative and checklists, including Single Event Violation codes, as necessary)

SEV Codes SEV Description

RECEIVED

NOV 23 2015

Inspection & Enforcement Management Unit (IEMU)

Name(s) and Signature(s) of Inspector(s)	Agency/Office/Phone and Fax Numbers	Date
Jon Klemesrud	EPA R10/OCE/IEMU 206 553-5068	11/20/15
Signature of Management Q A Reviewer	Agency/Office/Phone and Fax Numbers	Date
	EPA/OCE/IEMU 3-0955	1/6/2016

EPA Form 3560-3 (Rev 1-06) Previous editions are obsolete.

ICIS
11-23-15

INSTRUCTIONS

Section A: National Data System Coding *(i.e., PCS)*

Column 1: Transaction Code: Use N, C, or D for New, Change, or Delete. All inspections will be *new* unless there is an error in the data entered.

Columns 3-11: NPDES Permit No. Enter the facility's NPDES permit number - third character in permit number indicates permit type for U=unpermitted, G=general permit, etc.. *(Use the Remarks columns to record the State permit number, if necessary.)*

Columns 12-17: Inspection Date. Insert the date entry was made into the facility. Use the year/month/day format (e.g., 04/10/01 = October 01, 2004).

Column 18: Inspection Type*. Use one of the codes listed below to describe the type of inspection:

A Performance Audit
B Compliance Biomonitoring
C Compliance Evaluation (non-sampling)
D Diagnostic
F Pretreatment (Follow-up)
G Pretreatment (Audit)
I Industrial User (IU) Inspection
J Complaints
M Multimedia
N Spill
O Compliance Evaluation (Oversight)
P Pretreatment Compliance Inspection
R Reconnaissance
S Compliance Sampling
U IU Inspection with Pretreatment Audit
X Toxics Inspection
Z Sludge - Biosolids
Combined Sewer Overflow-Sampling
$ Combined Sewer Overflow-Non-Sampling
+ Sanitary Sewer Overflow-Sampling
& Sanitary Sewer Overflow-Non-Sampling
\ CAFO-Sampling
= CAFO-Non-Sampling
2 IU Sampling Inspection
3 IU Non-Sampling Inspection
4 IU Toxics Inspection
5 IU Sampling Inspection with Pretreatment
6 IU Non-Sampling Inspection with Pretreatment
7 IU Toxics with Pretreatment
! Pretreatment Compliance (Oversight)
@ Follow-up (enforcement)
{ Storm Water-Construction-Sampling
} Storm Water-Construction-Non-Sampling
: Storm Water-Non-Construction-Sampling
~ Storm Water-Non-Construction-Non-Sampling
< Storm Water-MS4-Sampling
- Storm Water-MS4-Non-Sampling
> Storm Water-MS4-Audit

Column 19: Inspector Code. Use one of the codes listed below to describe the *lead agency* in the inspection.

A — State (Contractor)
B ---- EPA (Contractor)
E — Corps of Engineers
J — Joint EPA/State Inspectors—EPA Lead
L ---- Local Health Department (State)
N — NEIC Inspectors
O— Other Inspectors, Federal/EPA (Specify in Remarks columns)
P— Other Inspectors, State (Specify in Remarks columns)
R — EPA Regional Inspector
S — State Inspector
T — Joint State/EPA Inspectors—State lead

Column 20: Facility Type. Use one of the codes below to describe the facility.

1 — Municipal. Publicly Owned Treatment Works (POTWs) with 1987 Standard Industrial Code (SIC) 4952.
2 — Industrial. Other than municipal, agricultural, and Federal facilities.
3 — Agricultural. Facilities classified with 1987 SIC 0111 to 0971.
4 — Federal. Facilities identified as Federal by the EPA Regional Office.
5 — Oil & Gas. Facilities classified with 1987 SIC 1311 to 1389.

Columns 21-66: Remarks. These columns are reserved for remarks at the discretion of the Region.

Columns 67-69: Inspection Work Days. Estimate the total work effort (to the nearest 0.1 work day), up to 99.9 days, that were used to complete the inspection and submit a QA reviewed report of findings. This estimate includes the accumulative effort of all participating inspectors; any effort for laboratory analyses, testing, and remote sensing; and the billed payroll time for travel and pre and post inspection preparation. This estimate does not require detailed documentation.

Column 70: Facility Evaluation Rating. Use information gathered during the inspection (regardless of inspection type) to evaluate the quality of the facility self-monitoring program. Grade the program using a scale of 1 to 5 with a score of 5 being used for very reliable self-monitoring programs, 3 being satisfactory, and 1 being used for very unreliable programs.

Column 71: Biomonitoring Information. Enter D for static testing. Enter F for flow through testing. Enter N for no biomonitoring.

Column 72: Quality Assurance Data Inspection. Enter Q if the inspection was conducted as followup on quality assurance sample results. Enter N otherwise.

Columns 73-80: These columns are reserved for regionally defined information.

Section B: Facility Data

This section is self-explanatory except for "Other Facility Data," which may include new information not in the permit or PCS (e.g., new outfalls, names of receiving waters, new ownership, other updates to the record, SIC/NAICS Codes, Latitude/Longitude).

Section C: Areas Evaluated During Inspection

Check only those areas evaluated by marking the appropriate box. Use Section D and additional sheets as necessary. Support the findings, as necessary, in a brief narrative report. Use the headings given on the report form (e.g., Permit, Records/Reports) when discussing the areas evaluated during the inspection.

Section D: Summary of Findings/Comments

Briefly summarize the inspection findings. This summary should abstract the pertinent inspection findings, not replace the narrative report. Reference a list of attachments, such as completed checklists taken from the NPDES Compliance Inspection Manuals and pretreatment guidance documents, including effluent data when sampling has been done. Use extra sheets as necessary.

*Footnote: In addition to the inspection types listed above under column 18, a state may continue to use the following wet weather and CAFO inspection types until the state is brought into ICIS-NPDES: K: CAFO, V: SSO, Y: CSO, W: Storm Water 9: MS4. States may also use the new wet weather, CAFO and MS4 inspections types shown in column 18 of this form. The EPA regions are required to use the new wet weather, CAFO, and MS4 inspection types for inspections with an inspection date (DTIN) on or after July 1, 2005.

National Pollutant Discharge Elimination System (NPDES) Inspection Report

Ershigs, Inc.
NPDES # WAR000048

Prepared by:

Jon Klemesrud
Environmental Protection Agency, Region 10
Office of Compliance and Enforcement
Inspection and Enforcement Management Unit

Table of Contents

[Unless otherwise noted, all details in this inspection report were obtained from conversations with Scott Strickler or from observations made during the inspection.]

I. Facility Information

Facility Name:	Ershigs, Inc. (Ershigs)
Facility Contacts:	Scott Strickler – Material Administrator / Env. Safety (360) 527-3437 sstrickler@ershigs.com
NAICS Code:	326199 – Plastics Product Manufacturing
Facility Location:	Ershigs, Inc. 742 Marine Drive Bellingham, WA 98227
GPS:	N 48.76833 W -122.519312
Mailing Address:	Ershigs, Inc. P.O. Box 1707 Bellingham, WA 98227
NPDES Tracking Number:	WAR000048
Effective Date:	01/02/2015
Expiration Date:	12/31/2019

II. Inspection Information

Inspection Date:	November 19, 2015
Inspectors:	Jon Klemesrud, Inspector EPA Region 10, OCE / IEMU (206) 553-5068 Joe Roberto, Inspector EPA Region 10, OCE / IEMU (206) 553-1669
Arrival Time:	08:15 AM
Departure Time:	01:15 PM
Weather Condition:	Sunny
Receiving waters:	Little Squalicum Creek

Purpose: This inspection was conducted to document the facility's compliance with the Washington Industrial Stormwater General Permit (ISGP) and Section 402 of the Clean Water Act.

III. Inspection Chronology

This was an unannounced inspection. On November 19, 2015 EPA inspector Joe Roberto and I arrived at Ershigs.

Upon arriving at the facility we met with Scott Strickler, Material Administrator and Safety/Environmental contact for Ershigs. At this time Joe and I identified ourselves as EPA inspectors, presented our inspector credentials and provided Mr. Strickler with our business cards. I informed Mr. Stickler that the purpose of the visit was to conduct a compliance inspection under the facility's ISGP.

The EPA inspection consisted of an opening conference to conduct initial introductions and to discuss the purpose and expectations of the inspection. The inspection included a records review and a facility walk-through.

The walk-through was followed by a closing conference where we discussed compliance-related concerns with Mr. Strickler.

IV. Background

Ershigs operates an industrial Fiberglass Reinforced Plastics (FRP) manufacturing facility located on 6.4 acres in Bellingham, WA. The facility has been at this location since the 1960's and is currently operated by 60 employees. Ershigs is owned by the parent company, Denali, Inc.

The majority of the activities at Ershigs occur indoors, including the engineering and manufacturing of FRP products. The footprint consists of approximately 5 larger buildings including a main office, assembly, fabrication and storage buildings. There is also a covered raw material/resin storage area.

The remainder of the property is exposed to stormwater and primarily used for equipment and product storage as well as the loading and unloading of material. See Attachment A, Facility Map, and Attachment B, Facility Aerial Image, for more details regarding the site overview.

V. Facility Review

The stormwater design and operation at Ershigs is such that precipitation falling within the footprint is routed to a series of 20 catch basins located within the perimeter. These 20 catch basins route stormwater runoff offsite through 2 monitored discharge locations. The 2 discharges later combine and enter a stormwater vault identified as outfall SW001.

According to the facility's Notice of Intent (NOI) and Mr. Strickler, outfall SW001 eventually discharges to Little Squalicum Creek via the City of Bellingham's stormwater system.

During the facility tour we examined all areas occupied by Ershigs including the material storage areas, all stormwater catch basins, sampling locations, and the facility's fueling station. See Attachment C, Photo Log for areas visited at the time of inspection.

I. Stormwater Generation, Treatment and Discharge

As indicated above, stormwater that falls within the footprint is routed to a series of 20 catch basins, the catch basins are identified by the facility as storm drains (SD) on their Facility Map (Attachment A). All 20 storm drains combine and discharge to outfall SW001, and are monitored from two monitoring points (SD-2 and SD-15).

SD-2 is the monitoring location for stormwater that is collected from the eastern half of the property, this includes the roof runoff water from the majority of the buildings and from a large area used for product storage and loading. SD-2 thru SD-12 are all connected via underground piping and stormwater from these areas is routed through SD-2 prior to discharge through SW001.

SD-15 is the monitoring location for stormwater that is collected from the western half of the property, this includes roof runoff from the main office building and resin storage building as well as stormwater from the graveled equipment storage and fueling area. SD-13 thru SD-20 area all connected via underground piping and stormwater from these areas is routed through SD-15 prior to discharge through SW001.

According to Mr. Strickler, recent stormwater corrective action best management practices incorporated at Ershigs include:

- Vacuum sweeping of paved surfaces. Ershigs purchased their own small sweeper in March of 2014 according to Mr. Strickler. High traffic areas are swept sometimes 4-5 times a week on an as needed basis by Ershigs personnel. The company also contracts out quarterly sweeping from Whirlwind Services, Inc. See Attachment C, Photo #7.

- Installation of Grattix bio-filtration systems on roof drain downspouts. In July of 2013 Ershigs installed a Grattix system to the roof drain downspout from the assembly building. With initially a reduction in Zinc levels, Ershigs purchased 6 additional Grattix systems in January/February 2014 to filter rainwater runoff from downspouts along several metal roof buildings. See Attachment C, Photo #4, #5 and #6.

- Installation of "ADSORB-it" stormwater catch basin filters with zeolite and carbon treatment media. According to Mr. Stickler, the facility purchased and installed 5 catch basin filters with zeolite media in April of 2015.

Upon receiving sample results back from the lab in November of 2015 Ershigs switched to a carbon treatment media to replace the zeolite media. See Attachment C, Photo #3.

- Installation of catch basin adsorbent socks. In June of 2015 Ershigs installed catch basin adsorbent socks in a number of catch basins located on the property. See Attachment C, Photo #3.

- Buildings #1 & #4 that are identified on the Facility Map (Attachment A) received a roof coating during 2014, to try and address high Zinc levels.

- Resurfacing of the graveled equipment storage area north of the main office. According to Mr. Stickler, in the fall of 2015 Ershigs has resurfaced the graveled area with spent asphalt pieces in an attempt to lower turbidity levels.

VI. Records Review

At the time of the inspection, the file review included the following records:

- **NPDES Permit** – At the time of the inspection Mr. Strickler provided me with the current copy of the ISGP.

- **Discharge Monitoring Reports (DMR's)** - At the time of the inspection I requested to see the past 5 years of monitoring data. All DMRs were provided by Mr. Strickler.

- **Stormwater Pollution Prevention Plan (SWPPP)** – At the time of the inspection I requested a copy of the latest SWPPP. The SWPPP was provided to me and was last revised June 6, 2015 and last certified by General Manager Steve Guay on August 27, 2015.

- **Sampling and Analytical Records** - At the time of the inspection I asked Mr. Strickler for all of the documentation associated with stormwater sampling at the facility for the past 5 years. Mr. Strickler provided me with completed lab reports from their contract lab, Avocet Environmental, as well as the associated chain of custody forms.

- **Monthly Visual Inspection Reports** – At the time of the inspection I requested to see the past 5 years of monthly visual inspection reports. Mr. Strickler provided me with the completed inspection reports.

- **Annual Reports** – At the time of the inspection I requested to see the past 5 years of monthly visual inspection reports. Mr. Strickler provided me with the completed Annual Reports.

VII. Areas of Concern

Observations during the inspection included the identification of 6 areas of concern. These areas of concern are described as follows:

A. Non-Reporting of Additional Monitoring

Section S4.B.6.c of the ISGP states that "permittees monitoring more than once per quarter shall average all of the monitoring results for each parameter (except for pH and "visible oil sheen") and compare the average value to the benchmark value.

According to the facility records, in the past 5 years (or 20 quarters), the facility had collected and analyzed an additional sample from SD-2 and SD-15 during 2 separate quarters:

- 1st Quarter 2015
  Routine stormwater sampling occurred for all parameters from both monitored catch basins SD-2 and SD-15 on 3/23/2015, the results were submitted in the facility's DMR. An additional sample was taken from SD-2 and SD-15 on 3/25/2015. The additional sample from SD-2 was analyzed for Zinc, and the additional sample from SD-15 was analyzed for Zinc and Turbidity. The analytical results for the 2nd sampling event were not averaged or included in the reported DMR. Results from both sampling events (3/23/2015 and 3/25/2015) exceeded benchmark values.

- 3rd Quarter 2015
  Routine stormwater sampling occurred for all parameters from both monitored catch basins, SD-2 and SD-15 on 8/31/2015, the results were submitted in the facility's DMR. An additional sample was taken from SD-2 and SD-15 on 9/25/2015. The additional sample from SD-2 was analyzed for Zinc, and the additional sample from SD-15 was analyzed for Zinc, Copper, and Turbidity. The analytical results for the 2nd sampling event were not averaged or included in the reported DMR. Results from both sampling events (8/31/2015 and 9/25/2015) exceeded benchmark values.

See Attachment D, 1st and 3rd Quarter 2015 DMR and Analytical Reports.

B. Exceedances of Zinc and Turbidity Benchmark Values from SD-15

As indicated above, the discharge from catch basin's SD-13 – SD-20 is monitored by the facility from SD-15 prior to entering Little Squalicum Creek via the City of Bellingham's stormwater system (SW001).

According to the facility DMR's, in the past 5 years (or 20 quarters), the discharge from SD-15 has exceeded the benchmark value for Zinc in 11 quarters and exceeded Turbidity in 11 quarters.

As stated earlier in this report, Ershigs has implemented a number of corrective action BMPs over the past 3-5 years and Zinc and Turbidity values continue to be high. See Attachment E, Ershigs 5 Year Zinc and Turbidity Sample Results. The additional BMPs appear to be ineffective in addressing the Zinc and Turbidity benchmark exceedances.

C. Exceedances of Zinc Benchmark Values from SD-2

As indicated above, the discharge from catch basin's SD-2 – SD-12 is monitored by the facility from point SD-2 prior to entering Little Squalicum Creek via the City of Bellingham's stormwater system (SW001).

According to the facility DMR's, in the past 5 years (or 20 quarters), the discharge from SD-2 has exceeded the benchmark value for Zinc in 15 quarters.

As stated earlier in this report, Ershigs has implemented a number of corrective action BMPs over the past 3-5 years and the numbers continue to be high. See Attachment E, Ershigs 5 Year Zinc and Turbidity Sample Results. The additional BMPs appear to be ineffective in addressing the Zinc benchmark exceedances.

D. Level 3 Corrective Action SWPPP Review

Section S8.D. of the permit states "permittees that exceed an applicable benchmark value in Table 2, Table 3, and/or Table 7 (for a single parameter) for any 3 quarters during a calendar year shall complete a Level 3 Corrective Action in accordance with S8.D." This includes "make appropriate revisions to the SWPPP to include additional treatment BMPs with the goal of achieving the applicable benchmark value(s) in future discharges" and "a qualified industrial stormwater professional shall review the revised SWPPP, the SWPPP Certification Form, and certify that it is reasonably expected to meet the ISGP benchmarks upon implementation.

Despite the additional corrective action BMPs, according to the facility records the discharge from SD-2 has exceeded has benchmark values for Zinc in at least 3 quarters during 2011, 2013, 2014 and 2015. The discharge from SD-15 has exceeded benchmark values for both Zinc and Turbidity in at least 3 quarters during 2013, 2014 and 2015.

The SWPPP was updated, reviewed and certified on 8/27/15 for a Level 1 Corrective Action by Ershigs General Manager Steve Guay. See Attachment F, 2015 SWPPP Certification.

According to the facility records, Ershigs triggered Level 3 Corrective Action which requires a qualified industrial stormwater professional certification and SWPPP review as defined in the permit. This Level 3 Corrective Action SWPPP review has not been completed.

E. Uncovered Dumpsters

Section S3.B.4.i.2.d. of the permit states that the permittee shall "keep all dumpsters under cover or fit with a lid that must remain closed when not in use."

At the time of inspection we observed a number of dumpsters at the facility, the two largest dumpsters located in the southwest corner of the facility did not have lids that would prevent stormwater from entering the dumpsters. See Attachment C, Photo #9, #10.

F. Secondary Containment at the Diacetone Alcohol (DAA) Distillation Area

Section S3.B.4.b.i.4.a. of the permit states that the permittee must "store all chemical liquids, fluids, and petroleum products, on an impervious surface that is surrounded with a containment berm or dike that is capable of containing 10% of the total enclosed tank volume or 110% of the volume contained in the largest tank, whichever is greater.

At the time of the inspection, we visited the DAA Distillation Area where DAA is recycled for reuse. The distillation unit is under cover, however they lack secondary containment. Staining was also observed on the paved area around the unit. SD-13 is located downslope and approximately 80ft away from DAA Distillation Area. See Attachment C, Photo #17, #18 and #19.

VIII. Closing Conference

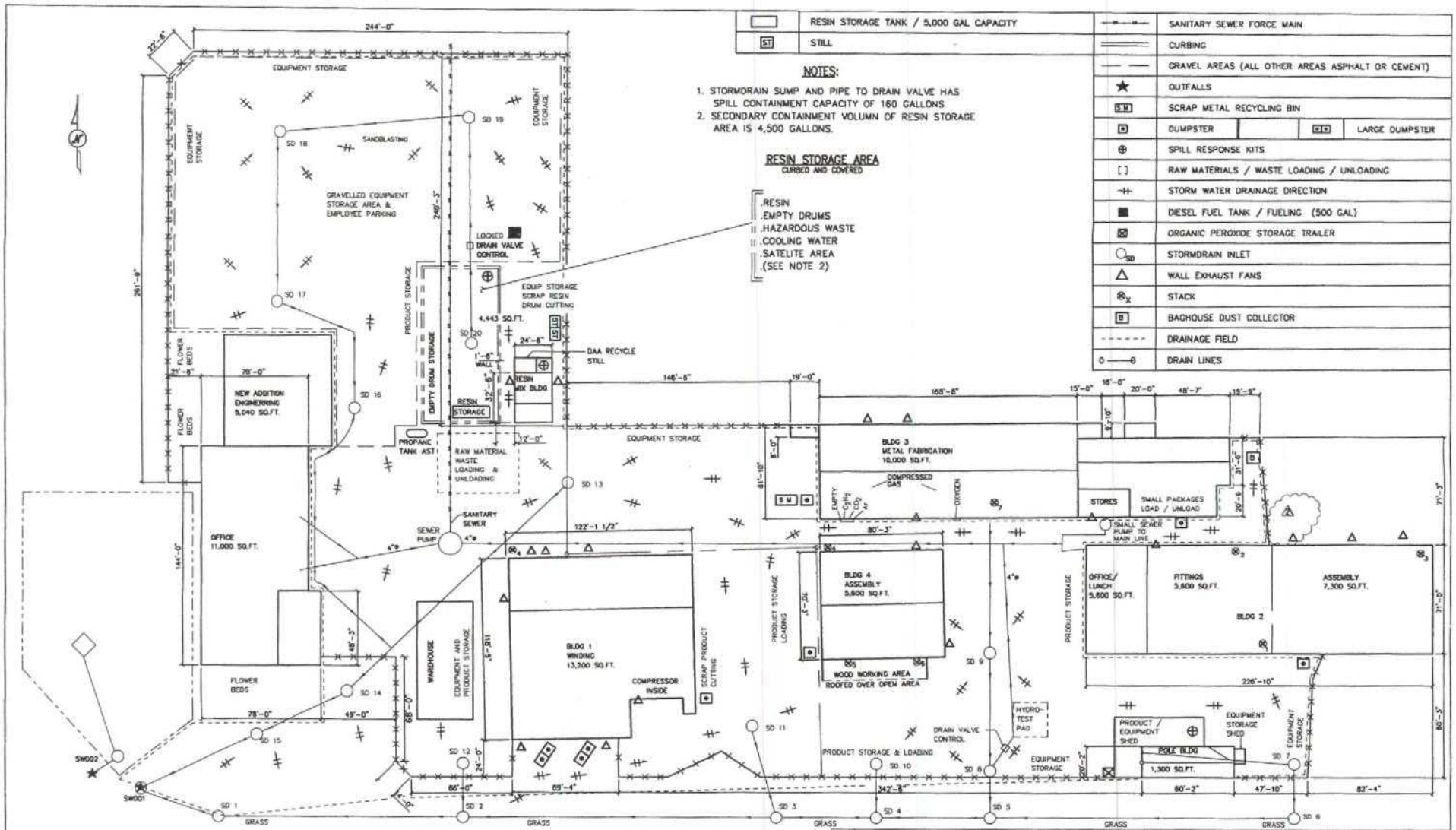
A closing conference was held with Mr. Stickler to discuss our inspection observations and concerns. We then thanked him for his time and cooperation with the inspection.

Report Completion Date: 01/04/15

Lead Inspector Signature:

Attachment A

Facility Map



ERSHIGS INC.
6.4 ACRES TOTAL

REV	REMARKS	DATE	BY
3	FOR CONST; ADDED STILL, WAREHOUSE & OTHER BLDS	8/10/10	PKM
2	FOR CONST; ELIMINATED SW003 & NUMBERED S.D.'s	4/21/03	JEG
1	FOR CONST. ADD RESIN STORAGE TANK	8/18/98	D.LEWIS
0	FOR CONSTRUCTION	8/18/98	D.LEWIS

ERSHIGS
STORMWATER PLOT PLAN 'A'
ERSHIGS INC. BELLINGHAM, WA.

DRAWN DJL	DATE 4/10/98
CHECKED	DATE
PRODUCTION	DATE
ENGINEER	DATE
SHEET 1 OF 1	
DWG. NO. DE910021	REV. 3
CUST. P.O.	JOB NO.
CUSTOMER ERSHIGS, INC.	

LAST EDITED BY:KMason
PLOTTED: 08/11/2010 08:27 am
FILE: DE910021.DWG

Attachment B

Facility Aerial Image

Attachment C

Photo Log

All photographs were taken by Joe Roberto on 11/19/2015

Photo Log – Ershigs, Inc.

Photo #:01
Description: Sign in front of the office building at the facility. Camera photo # SAM 2217.

Photo #:02
Description: Westerly view along the south side of the facility. Photographer was standing near the southeast corner of the property. Camera photo # SAM 2218.

Photo #:03
Description: View of catch basin insert for the catch basin located near the southeast corner of the property. Camera photo # SAM 2224.

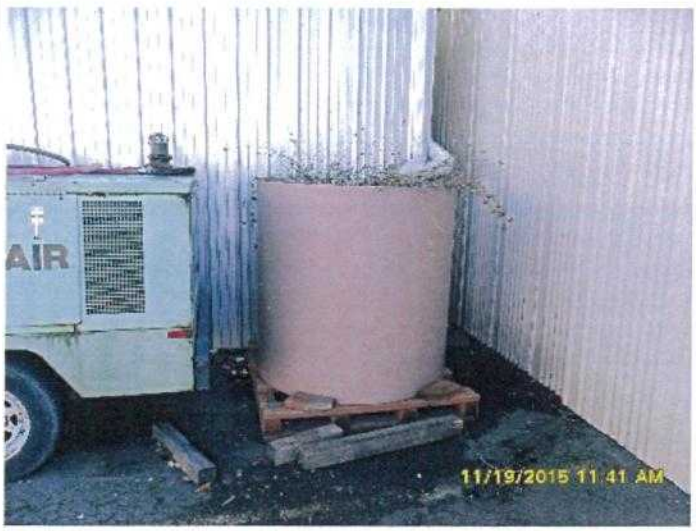


Photo #:04
Description: View of one of the stormwater treatment systems (Grattix) at the facility. This system treats roof runoff from the galvanized building located near the southeast corner of the property. According to Mr. Strickler, this was the first treatment system installed on the property. Camera photo # SAM 2226.

Photo Log – Ershigs, Inc.

Photo #:05
Description: View of another Grattix treatment system at the facility. This system was installed in 2014 and is used to treat roof runoff from another building at the facility. Camera photo # SAM 2228.

Photo #:06
Description: Close-up view of the Grattix treatment system shown in the previous photograph. Camera photo # SAM 2229.

Photo #:07
Description: View of small vacuum sweeper used to clean outdoor pave surfaces at the facility. Camera photo # SAM 2233.

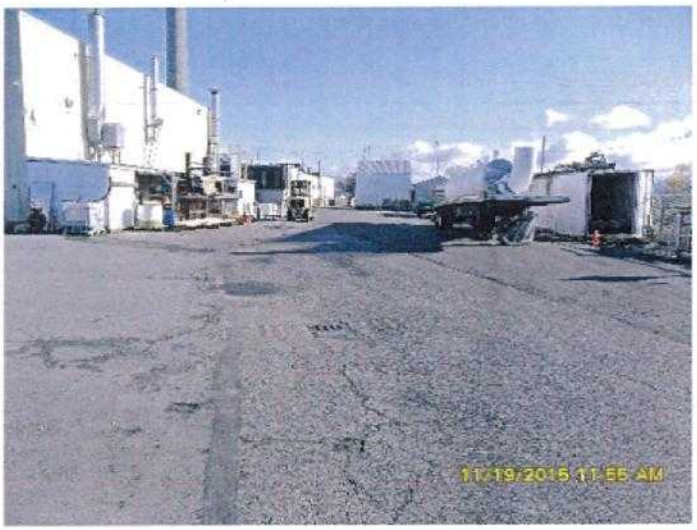


Photo #:08
Description: Easterly view showing activities along the south side of the property. Camera photo # SAM 2234.

Photo Log – Ershigs, Inc.

Photo #:09
Description: View of two open dumpster located along the south side of the facility. Note that although these dumpsters did have covers, the covers consisted of a wire mesh material. Camera photo # SAM 2235.

Photo #:10
Description: View inside one of the two open dumpsters shown in the previous photograph. Camera photo # SAM 2236.

Photo #:11
Description: View inside sample point SD-15. Camera photo # SAM 2238.

Photo #:12
Description: Easterly view along the south side of the property. Note the location of sample point SD-2 in the foreground. Camera photo # SAM 2239.

Photo Log – Ershigs, Inc.

Photo #:13
Description: View of one of the catch basins located in the graveled area in the northwest portion of the property. According to Mr. Strickler, drainage entering this catch basin is routed through sample point SD-15. Camera photo # SAM 2241.

Photo #:14
Description: Northwesterly view of the graveled area located in the northwest portion of the property. Drainage in this area is routed through sample point SD-15. Camera photo # SAM 2242.

Photo #:15
Description: View of the fuel tank located in the graveled area (or northwest portion) of the facility. Camera photo # SAM 2246.

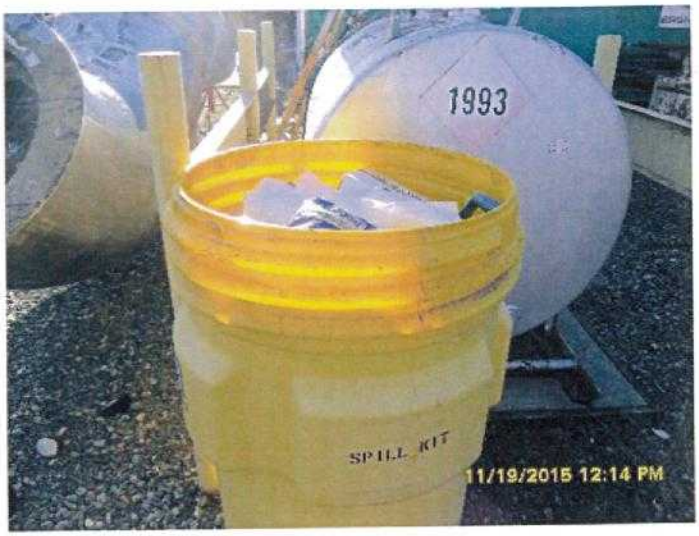


Photo #:16
Description: View of the spill kit located near the fuel tank shown in the previous photograph. Camera photo # SAM 2248.

Photo Log– Ershigs, Inc.

Photo #:17
Description: View of the solvent still. The individual in the photograph is dumping spent solvent into the still. Camera photo # SAM 2250.

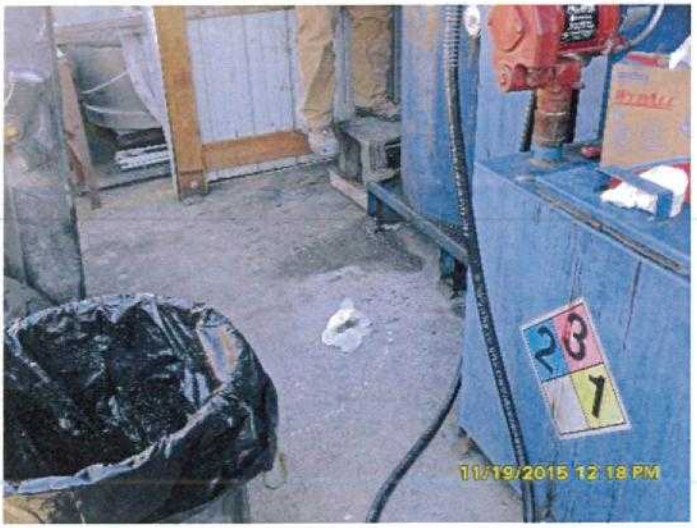


Photo #:18
Description: View of the ground surface in the vicinity of the solvent still. Note the staining on the ground. Camera photo # SAM 2251.

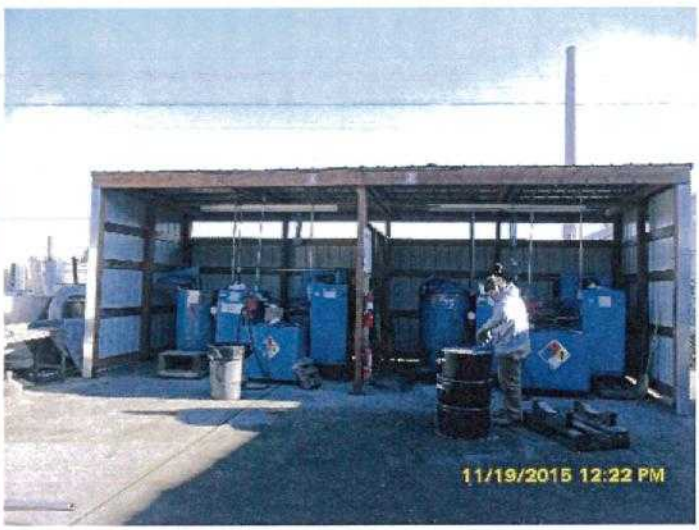


Photo #:19
Description: Broad view of the solvent still and vicinity. Note that the solvent still is under cover, however, it is not totally enclosed. Camera photo # SAM 2253.

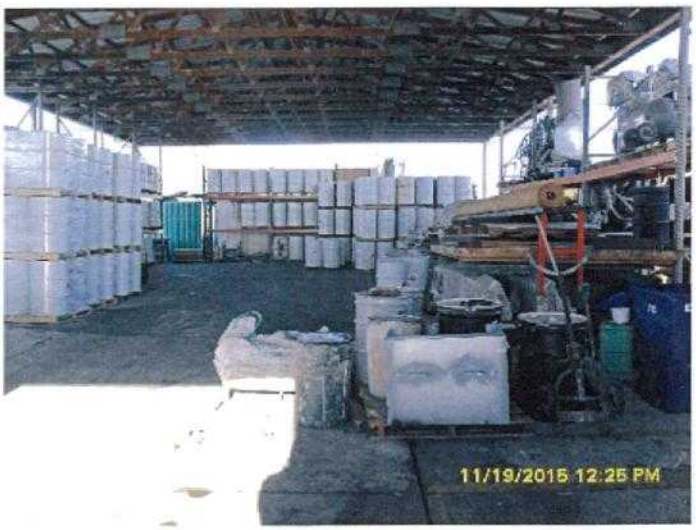


Photo #:20
Description: Northerly view inside the resin storage building. Camera photo # SAM 2254.

Attachment D

1st and 3rd Quarter 2015 DMR and Analytical Reports

1st Quarter 2015

Washington Department of Ecology Submission Cover Letter

WQWebDMR - DMR Submission Id: 1499754 - 5/5/2015 10:46:57 AM

Report Received Dated: 5/5/2015 10:46:58 AM

Company Name	Signer Name	System Name
Ershigs Inc	Scott Strickler	WQWebPortal

Attachments:

Document Name of Description	Document File Name
Submitted Copy of Record for Ershigs Inc	Copy of Record ErshigsInc Tuesday May 05 2015

Attestation Agreed to at Signing:

I certify I personally signed and submitted to the Department of Ecology an Electronic Signature Agreement. I understand that use of my electronic signature account/password to submit this information is equal to my written signature. I have read and followed all the rules of use in my Electronic Signature Agreement. I believe no one but me has had access to my password and other account information.

I further certify: I had the opportunity to review the content or meaning of the submittal before signing it; and to the best of my knowledge and belief, the information submitted is true, accurate, and complete. I intend to submit this information as part of the implementation, oversight, and enforcement of a federal environmental program. I am aware there are significant penalties for submitting false information, including possible fines and imprisonment.

For Ecology Use Only ---
Dev

ukcVTvJpARYPqDkq2QMT1ggNEH4otfIsPwDXbGYmLMF3R3MYXKQ4Sfky8
hRRJomhkOHHuWHvvxPwJFx5QiiaIQfiqh6sWGhE68Q4WN8jwY=

Washington State Department of Ecology **Discharge Monitoring Report (DMR)**

Permit Number: WAR000048 **Permittee:** ERSHIGS INC

Facility County: Whatcom **Receiving Waterbody:**

Monitoring Period: 01/01/2015 - 03/31/2015 **Outfall:** SWO1 - OUTFALL **Version:** 1

Week	Monitoring Point	Turbidity (NTU) Measured NTU Quarterly Grab	pH Standard Units Quarterly Grab	Oil & Grease Yes/No Quarterly Visual Observation	Copper Total Micrograms/L (ug/L) Quarterly Grab	Zinc Total Micrograms/L (ug/L) Quarterly Grab	Lead Total Micrograms/L (ug/L) Quarterly Grab	NWTPHDx Diesel (NWTPH Dx) (semi-volatile) Milligrams/L (mg/L) Quarterly Grab	Turbidity (NTU) Measured NTU Quarterly Grab	pH Standard Units Quarterly Grab	Oil & Grease Yes/No Quarterly Visual Observation	Copper Total Micrograms/L (ug/L) Quarterly Grab
		SD15	SD15	SD15	SD15	SD15	SD15	SD15	SD2	SD2	SD2	SD2
Limit Set		ISGP Western WA - 2015 Permit	ISGP Western WA - 2015 Permit	ISGP Western WA - 2015 Permit	ISGP Western WA - 2015 Permit	ISGP Western WA - 2015 Permit	ISGP Primary Metals - 2015 Permit	ISGP Primary Metals - 2015 Permit	ISGP Western WA - 2015 Permit	ISGP Western WA - 2015 Permit	ISGP Western WA - 2015 Permit	ISGP Western WA - 2015 Permit
13-M	3/23/15	50	7.53	no	14.6	140	3.3	0.238	13	8.24	no	7.4
Minimum			7.53							8.24		
			BM: >= 5.0 (RO)							BM: >= 5.0 (RO)		
Average		50			14.6	140	3.3	0.238	13			7.4
		BM: <= 25			BM: <= 14	BM: <= 117	BM: <= 81.6	BM: <= 10	BM: <= 25			BM: <= 14
Maximum			7.53							8.24		
			BM: <= 9.0 (RO)							BM: <= 9.0 (RO)		

I certify under penalty of law, that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system or those persons directly responsible for gathering information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Scott Strickler
Signature

5/5/2015 10:46:56 AM
Date

Avocet Environmental Testing
1500 North State Street, Suite 200
Bellingham, WA 98225-4551
(360) 734-9033

AVOCET
ENVIRONMENTAL TESTING

Client	**Ershigs, Inc.**
Contact Name	Scott Strickler
Chain of Custody	4200
Date Sampled	03/23/15
Date Received	03/23/15
Date Reported	04/10/15
Project Name	**Stormwater**
Matrix	Stormwater

Sample Identification	Log Number	Test Performed	Method	**Sample Result**	Units	QL	MDL	Date Analyzed	Analyst
Stormdrain 2	05749215	Fecal Coliform	sm9222D	**5,800**	FC/100 mL	--	--	03/23/15	DH
		Turbidity	EPA180.1	**13**	NTU	0.1	--	03/24/15	AH
		Copper (CAS #: 7440-50-8)	sm3113B	**7.4**	µg/L	2.0	0.4	04/07/15	ML
		Lead (CAS #: 7439-92-1)	sm3113B	**1.6**	µg/L	0.5	0.1	04/06/15	ML
		Zinc (CAS #: 7440-66-6)	sm3111B	**172**	µg/L	15	3.0	04/07/15	ML
		Diesel Range Hydrocarbons	NWTPHDX	**0.251**	mg/L	0.05	0.02	04/02/15	*
		Lube Oil Range Hydrocarbons	NWTPHDX	**0.261**	mg/L	0.1	0.05	04/02/15	*

*: Analyzed by Anatek Labs, Inc.
--: No Existing Value
FC: Fecal Coliform
MDL: Method Detection Limit
QL: Quantitation Limit
NTU: Nephelometric Turbidity Units

Allyson Hayes
Laboratory Supervisor

Avocet Environmental Testing
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Bellingham, WA 98225-4551
(360) 734-9033

AVOCET
ENVIRONMENTAL TESTING

Client	**Ershigs, Inc.**
Contact Name	Scott Strickler
Chain of Custody	4200
Date Sampled	03/25/15
Date Received	03/25/15
Date Reported	04/13/15
Project Name	**Stormwater**
Matrix	Stormwater

Sample Identification	Log Number	Test Performed	Method	**Sample Result**	Units	QL	MDL	Date Analyzed	Analyst
Stormdrain 2	05749264	Zinc (CAS #: 7440-66-6)	sm3111B	**130**	µg/L	15	3.0	04/07/15	ML
Stormdrain 15	05749265	Zinc (CAS #: 7440-66-6)	sm3111B	**140**	µg/L	15	3.0	04/07/15	ML
		Turbidity	EPA180.1	**50**	mg/L	0.2	--	03/26/15	DH

QUALITY CONTROL DATA

Test Performed	QC Known Recovery	Recovery Limits	Duplicate Difference
Zinc	101%	90-110%	12%
Turbidity	96%	90-110%	N/A

MDL: Method Detection Limit
N/A: Not Applicable
QL: Quantitation Limit

Laboratory Supervisor

3rd Quarter 2015

Washington Department of Ecology Submission Cover Letter

WQWebDMR - Permit# WAR000048 - DMR Submission Id: 1518818 - 11/4/2015 10:52:15 AM

Report Received Dated: 11/4/2015 10:52:16 AM

Company Name	Signer Name	System Name
Ershigs Inc	Scott Strickler	WQWebPortal

Attachments:

Document Name of Description	Document File Name
Submitted Copy of Record for Ershigs Inc	Copy of Record ErshigsInc Wednesday November 04 2015

Attestation Agreed to at Signing:

I certify I personally signed and submitted to the Department of Ecology an Electronic Signature Agreement. I understand that use of my electronic signature account/password to submit this information is equal to my written signature. I have read and followed all the rules of use in my Electronic Signature Agreement. I believe no one but me has had access to my password and other account information.

I further certify: I had the opportunity to review the content or meaning of the submittal before signing it; and to the best of my knowledge and belief, the information submitted is true, accurate, and complete. I intend to submit this information as part of the implementation, oversight, and enforcement of a federal environmental program. I am aware there are significant penalties for submitting false information, including possible fines and imprisonment.

For Ecology Use Only ---
Dev

9gjnuUCIGx
+BDH5rsOJ24OJ78FoG6cZvw0bZHq6AArZ0+IZf49104FefPi10Rt7HFq1a1ZCWHSAs4UnYK62AtJnwcIT
UBamOqJWKRugN12U=

Washington State Department of Ecology — Discharge Monitoring Report (DMR)

Permit Number: WAR000048 **Permittee:** ERSHIGS INC

Facility County: Whatcom **Receiving Waterbody:**

Monitoring Period: 07/01/2015 - 09/30/2015 **Outfall:** SWO1 - OUTFALL **Version:** 1

Week	Monitoring Point	Turbidity (NTU) Measured NTU Quarterly Grab	pH Standard Units Quarterly Grab	Oil & Grease Yes/No Quarterly Visual Observation	Copper Total Micrograms/L (ug/L) Quarterly Grab	Zinc Total Micrograms/L (ug/L) Quarterly Grab	Lead Total Micrograms/L (ug/L) Quarterly Grab	NWTPH-Dx Diesel (NWTPH-Dx) (semi-volatile) Milligrams/L (mg/L) Quarterly Grab	Turbidity (NTU) Measured NTU Quarterly Grab	pH Standard Units Quarterly Grab	Oil & Grease Yes/No Quarterly Visual Observation	Copper Total Micrograms/L (ug/L) Quarterly Grab
		SD15	SD15	SD15	SD15	SD15	SD15	SD15	SD2	SD2	SD2	SD2
Limit Set		ISGP Western WA - 2015 Permit	ISGP Western WA - 2015 Permit	ISGP Western WA - 2015 Permit	ISGP Western WA - 2015 Permit	ISGP Western WA - 2015 Permit	ISGP Primary Metals - 2015 Permit	ISGP Primary Metals - 2015 Permit	ISGP Western WA - 2015 Permit	ISGP Western WA - 2015 Permit	ISGP Western WA - 2015 Permit	ISGP Western WA - 2015 Permit
10-M	8/31/15	130	7.49	no	19.1	209	5.0	0.420	19	7.34	no	10.6
Minimum			7.49							7.34		
			BM: >= 5.0 (RO)							BM: >= 5.0 (RO)		
Average		130			19.1	209	5.0	0.420	19			10.6
		BM: <= 25			BM: <= 14	BM: <= 117	BM: <= 81.6	BM: <= 10	BM: <= 25			BM: <= 14
Maximum			7.49							7.34		
			BM: <= 9.0 (RO)							BM: <= 9.0 (RO)		

I certify under penalty of law, that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system or those persons directly responsible for gathering information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Scott Strickler
Signature

11/4/2015 10:52:15 AM
Date

Week	Monitoring Point	Zinc Total Micrograms/L (ug/L) Quarterly Grab	Lead Total Micrograms/L (ug/L) Quarterly Grab	NWTPHDx Diesel (NWTPH Dx) (semi-volatile) Milligrams/L (mg/L) Quarterly Grab
		SD2	SD2	SD2
Limit Set		ISGP Western WA - 2015 Permit	ISGP Primary Metals - 2015 Permit	ISGP Primary Metals - 2015 Permit
10-M	8/31/15	210	3.5	0.504
Minimum				
Average		210	3.5	0.504
		BM: <= 117	BM: <= 81.6	BM: <= 10
Maximum				

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AVOCET
ENVIRONMENTAL TESTING

Client **Ershigs, Inc.**
Contact Name Scott Strickler

Chain of Custody 4200

Date Sampled 08/31/15
Date Received 08/31/15
Date Reported 09/18/15

Final Report

Project Name **Stormwater**
Matrix Stormwater

Sample Identification	Log Number	Test Performed	Method	**Sample Result**	Units	QL	MDL	Date Analyzed	Analyst
Stormdrain 15	05754399	Fecal Coliform	sm9222D	**>16,000**	FC/100 mL	--	--	08/31/15	ML
		Turbidity	EPA180.1	**130**	NTU	0.4	--	09/01/15	GW
		Copper (CAS #: 7440-50-8)	sm3113B	**19.1**	µg/L	2.0	0.4	09/03/15	ML
		Lead (CAS #: 7439-92-1)	sm3113B	**5.0**	µg/L	0.5	0.1	09/08/15	ML
		Zinc (CAS #: 7440-66-6)	sm3111B	**209**	µg/L	15	3.0	09/03/15	ML
		Diesel Range Hydrocarbons	NWTPHDX	**0.100**	mg/L	0.05	0.02	09/14/15	*
		Lube Oil Range Hydrocarbons	NWTPHDX	**0.320**	mg/L	0.1	0.05	09/14/15	*

*: Analyzed by Anatek Labs, Inc.
--: No Existing Value
FC: Fecal Coliform
MDL: Method Detection Limit
QL: Quantitation Limit
NTU: Nephelometric Turbidity Units

Laboratory Supervisor

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AVOCET
ENVIRONMENTAL TESTING

Client **Ershigs, Inc.**
Contact Name Scott Strickler

Chain of Custody 4200

Date Sampled 08/31/15
Date Received 08/31/15
Date Reported 09/18/15

Final Report

Project Name **Stormwater**
Matrix Stormwater

Sample Identification	Log Number	Test Performed	Method	**Sample Result**	Units	QL	MDL	Date Analyzed	Analyst
Stormdrain 2	05754398	Fecal Coliform	sm9221E	**>1,600**	FC/100 mL	--	--	08/31/15	ML
		Turbidity	EPA180.1	**19**	NTU	0.1	--	09/01/15	GW
		Copper (CAS #: 7440-50-8)	sm3113B	**10.6**	µg/L	2.0	0.4	09/03/15	ML
		Lead (CAS #: 7439-92-1)	sm3113B	**3.5**	µg/L	0.5	0.1	09/08/15	ML
		Zinc (CAS #: 7440-66-6)	sm3111B	**210**	µg/L	15	3.0	09/03/15	ML
		Diesel Range Hydrocarbons	NWTPHDX	**0.120**	mg/L	0.05	0.02	09/14/15	*
		Lube Oil Range Hydrocarbons	NWTPHDX	**0.384**	mg/L	0.1	0.05	09/14/15	*

*: Analyzed by Anatek Labs, Inc.
--: No Existing Value
FC: Fecal Coliform
MDL: Method Detection Limit
QL: Quantitation Limit
NTU: Nephelometric Turbidity Units

Laboratory Supervisor

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AVOCET
ENVIRONMENTAL TESTING

Client	**Ershigs, Inc.**
Contact Name	Scott Strickler
Chain of Custody	4200
Date Sampled	09/25/15
Date Received	09/25/15
Date Reported	10/08/15
Project Name	**3 Qtr Stormwater**
Matrix	Stormwater

Sample Identification	Log Number	Test Performed	Method	**Sample Result**	Units	QL	MDL	Date Analyzed	Analyst
Stormdrain 2	05755534	Zinc (CAS #: 7440-66-6)	sm3111B	**215**	µg/L	15	3.0	10/07/15	ML
Stormdrain 15	05755535	Zinc (CAS #: 7440-66-6)	sm3111B	**225**	µg/L	15	3.0	10/07/15	ML
		Copper (CAS #: 7440-50-8)	sm3111B	**13.7**	µg/L	2.0	0.4	10/06/15	ML
		Turbidity	EPA180.1	**40**	mg/L	0.1	--	09/25/15	GW

QUALITY CONTROL DATA

Test Performed	QC Known Recovery	Recovery Limits	Duplicate Difference
Zinc	100%	90-110%	1%
Copper	92%	90-110%	4%
Turbidity	101%	90-110%	N/A

MDL: Method Detection Limit
N/A: Not Applicable
QL: Quantitation Limit

Laboratory Supervisor

Attachment E

Ershigs 5 Year Zinc & Turbidity Sample Results

Values were copied by Joe Roberto off Ershigs DMR's at the time of the inspection

Ershigs 5 Year Zinc and Turbidity Sample Results

*numbers in bold indicate benchmark exceedance

* Benchark Values: Turbidity: 25 NTU, Zinc: 117 ug/L

SD-2

Year	Quarter	Turbidity (NTU)	Zinc (ug/L)
2015	4th	**64**	**295**
2015	3rd	19	**215/210**
2015	2nd		
2015	1st	13	**172/130**
2014	4th	20	**216**
2014	3rd	21	**369**
2014	2nd	18	**441**
2014	1st	20	**313**
2013	4th	8.5	**290**
2013	3rd	29	**455**
2013	2nd	5.1	**455**
2013	1st	34	**592**
2012	4th	**37**	**443**
2012	3rd	1.2	117
2012	2nd	1.8	83.7
2012	1st	1.6	108
2011	4th	17	**507**
2011	3rd	16	**637**
2011	2nd	2.8	75.8
2011	1st	14	**126**

SD-15

Year	Quarter	Turbidity (NTU)	Zinc (ug/L)
2015	4th	**97**	135
2015	3rd	**130/40**	**225/209**
2015	2nd		
2015	1st	**94/50**	**147/140**
2014	4th	**43**	**136**
2014	3rd	20	**202**
2014	2nd	**130**	**213**
2014	1st	**63**	115
2013	4th	6.6	50
2013	3rd	**210**	**265**
2013	2nd	**29**	**143**
2013	1st	**70**	**167**
2012	4th	**64**	**204**
2012	3rd	0.5	51.5
2012	2nd	0.9	31.4
2012	1st	1	49.4
2011	4th	1.6	67.5
2011	3rd	**180**	**385**
2011	2nd	2.2	41.5
2011	1st	2.8	78

Attachment F

2015 SWPPP Certification

SECTION 7.0
SWPPP CERTIFICATION

The Permitee shall use this form to sign and certify that the Stormwater Pollution Prevention Plan (SWPPP) is complete, accurate and in compliance with the Conditions S3 and S8 of the Industrial Stormwater General Permit.

- A SWPPP certification form needs to be completed and attached to all SWPPPs.
- Each time a Level 1. 2 or 3 Corrective Action is required, this form needs to be re-signed and re-certified by the Permitee, and attached to the SWPPP.

Is this SWPPP certification in response to a Level 1, 2 or 3 Corrective Action? ☑Yes ☐No

If Yes:

- Type of corrective Action? ☑Level 1 ☐Level 2 ☐Level 3
- Date SWPP update/revision completed: Aug 25 2015

" I certify under penalty of law that this SWPPP and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate information to determine compliance with the Industrial Stormwater General Permit. Based on my inquiry of the person or persons who are responsible for stormwater management at my facility, this SWPPP is, to the best of my knowledge and belief, true, accurate, and complete and in full compliance with Permit conditions S3 and S8, including the correct Best Management Practices from the applicable Stormwater Management Manual. I am aware that there are significant penalties for submitting false information, including the possibility of fine imprisonment for knowing violations."

Steve Guay	General Manager
Operator's Printed Name*	Title
	8/27/15
Operator's Signature*	Date

* Federal regulations require this document to be signed as follows:
For a corporation, by a principal executive officer of at least the level of vice president;
For a partnership or sole proprietorship, by a general partner or the proprietor, respectively; or
For a municipality, state, federal, or other public facility, by either a principal executive officer or ranking elected official.

This document shall be signed by a person described above or by a duly authorized representative of that person. A person is duly authorized representative if:

1. The authorization is made in writing by a person described above and submitted to the Ecology.
2. The authorization specifies either an individual or a position having responsibility for the overall operation of the regulated facility, such as the position of a plant manager, superintendent, position of equivalent responsibility, or an individual or position having overall responsibility for environmental matters.

** If an authorization under 2 above is no longer accurate because a different individual or position has responsibility for the overall operation of the facility, a new authorization satisfying the requirements of number 2 above shall be submitted to Ecology prior tom, to together with any reports, information, or applications to be signed by an authorized representative.